

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION**

PAULETTE WEBSTER,)
)
Plaintiff,)
)
v.)
)
ENHANCED RECOVERY)
COMPANY, LLC, AKA)
ENHANCED RECOVERY)
CORPORATION)
)
Defendant.)
_____)

Case No. 2:11-cv-00018-LGW-JEG

**DEFENDANT ENHANCED RECOVERY COMPANY, LLC'S
MOTION TO DISMISS**

DEFENDANT ENHANCED RECOVERY COMPANY, LLC (the "Defendant") pursuant to Rule 37(d) of the Federal Rules of Civil Procedure, moves this Court for an Order dismissing Plaintiff's this case with prejudice for the reasons set forth in the attached Memorandum of Law in Support of Defendant's Motion to Dismiss.

RESPECTFULLY SUBMITTED this 5th day of January, 2012.

GILBERT, HARRELL, SUMERFORD &
MARTIN, P.C.

By: /s Jeffrey S. Ward
Jeffrey S. Ward
Georgia Bar No. 737277

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Telephone: (912) 265-6700

ATTORNEYS FOR THE DEFENDANT

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CERTIFICATE OF SERVICE

I do hereby certify that I have filed the foregoing **Defendant’s Enhanced Recovery Company, LLC’s Motion to Dismiss** with prejudice has been filed with the Clerk of Court using the CM/ECF system, and has been served upon the following counsel of record for all parties on this 5th day of January, 2012 by First Class Mail postage pre-paid:

Paulette Webster
702 Avalon Ave.
Brunswick, GA 31523

This 5th day of January, 2012.

GILBERT, HARRELL, SUMERFORD &
MARTIN, P.C.

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